1	1	S DISTRICT COURT
2	FOR THE WESTERN DI	STRICT OF PENNSYLVANIA
3		
4	LISA MICHELLE LAMBERT,	: :
5	PLAINTIFF,	: :
6	-v-	: :
7	SUPERINTENDENT WILLIAM WOLFE, in his individual	DOCKET CA 96-247 ERIE
8	capacity,	:
9	and	: :
10	DEPUTY SUPERINTENDENT CHARLES UTZ, in his	DEPOSITION UPON
11	individual capacity,	: ORAL EXAMINATION :
12	and	: OF:
13 14	CAPTAIN KEITH BARTLETT, in his individual capacity,	: LISA MICHELLE LAMBERT
15	and	• :
	·	: :
16 17	JOHN RAUN, in his individual capacity,	: :
L8	and	: :
19	JAMES EICHER, in his individual capacity,	: : :
20	and	: :
21	DEPUTY SUPERINTENDENT	: :
22	VICTORIA KORMANIC, in her individual capacity,	: :
23	DEFENDANTS.	- : :
24		: A 203

1	TRANSCRIPT of the stenographic notes of the
2	proceedings taken in the above-entitled matter, as
3	taken by PASQUALE F. CORVINE, a Certified Shorthand
4	Reporter and Notary Public of the State of New Jersey,
5	at the EDNA MAHAN CORRECTIONAL FACILITY FOR WOMEN,
6	P.O. Box 4004, Clinton, New Jersey 08809-4004, on
7	Thursday, July 22, 1999, commencing at 10:00 a.m.
8	
9	
10	APPEARANCES
11	
12	PENNSYLVANIA INSTITUTIONAL LAW PROJECT
13	BY: ANGUS R. LOVE, ESQ. EXECUTIVE DIRECTOR
14	924 Cherry Street Suite 523
15	Philadelphia, Pennsylvania 19107 ON BEHALF OF THE PLAINTIFF
16	MIKE FISHER, ESQ.
17	ATTORNEY GENERAL BY: THOMAS F. HALLORAN, ESQ.
18	SENIOR DEPUTY ATTORNEY GENERAL Commonwealth of Pennsylvania
19	Office of the Attorney General Litigation Section
20	6th Floor, Manor Complex 564 Forbes Avenue
21	Pittsburgh, Pennsylvania 15219 ON BEHALF OF THE DEFENDANTS
22	
23	
24	JOHN F. TRAINOR, INC. BY: PASQUALE F. CORVINE
25	CERTIFIED SHORTHAND REPORTER LICENSE NO.: X100645
	A 204

1	LISA MICHELLE
2	L A M B E R T, having first been duly
3	sworn, was examined and testified as
4	follows:
5	
6	EXAMINATION BY
7	MR. HALLORAN:
8	
9	Q Ms. Lambert, would you state your name
10	for the record.
11	A Lisa Michelle Lambert.
12	Q Ms. Lambert, I'm Tom Halloran. I'm with
13	the Pennsylvania Attorney General's Office, and I
14	represent the defendants in a lawsuit that you filed
15	in the United States District Court, Western Section
16	of Pennsylvania, Civil Action No. 96-247 ERIE.
17	In that lawsuit you have named Superintendent
18	William Wolfe, Deputy Superintendent Charles Utz,
19	Captain Keith Bartlett, John Raun, James Eicher, and
20	Deputy Superintendent Victoria Kormanic as defendants.
21	Are you familiar with that lawsuit?
22	A Yes.
23	Q I'm going to ask you some questions about
24	that lawsuit and some of the facts underlying it.
25	And if you don't understand my question, ask me

2 related to you? 3 A I have no knowledge of that. I have never seen 4 Superintendent Wolfe speaking to Captain Bartlett. 5 Q Okay. Did Captain Bartlett come to you 6 and ask you questions about your allegations regarding 7 either John Raun or James Eicher? 8 A Yes. 9 Q You have also named as defendant Deputy 10 Superintendent Victoria Kormanic, and what is the 11 basis of your allegation against Deputy Superintendent 12 Kormanic? 13 A I feel she repeatedly disregarded my 14 complaints. I feel that she used humiliation and 15 intimidation when she videotaped me. I feel that she 16 purposely verbally abused me. She ignored my plight. 17 I feel that she took the word of her officers over my 18 word just because they were officers. 19 Q Now, you make some specific allegations with regard to Ms. Kormanic as it relates to the	l abuse, as they
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20 with regard to Ms. Kormanic as it relates to the	pecific allegations
January 10 Transport 10 Cite	relates to the
videotaping. Do you recall those?	?
22 A Yes.	
Q All right. Are those true allegations?	true allegations?
24 A Yes.	
Q Now, in your complaint you indicated you	it you indicated you

1	participated in helping Officer Eicher do things to
2	me.
3	Q Was that on one occasion?
4	A Yes.
5	Q And was that in May of 1993?
6	A Yes no. I think it was March, March 19th.
7	Q March 19, 1994?
8	A Yes.
9	Q With regard to Officer Eicher, you allege
10	ongoing victimization. When was the first incident
11	that you recall with Officer Eicher?
12	A He started following me around in October of
13	'93, and that was basically just general sexual
14	harassment. He tried to offer me gifts. He basically
15	followed me around everywhere I went and kept
16	complementing me, kept writing me letters telling me
17	he was in love with me, and that's as far as it went
18	for two months until Christmas Eve. I just
19	basically
20	Q Christmas Eve nineteen ninety
21	A '93, I think. I'm confused about these years
22	because it's been so long.
23	Q And so from October 1993 to December 1993
24	you perceived him following you around and he offered
25	you gifts. What gifts did he offer you? A 209

1	A Chocolate, perfume, lace panties. I can't
2	remember. He would just try to slip things into my
3	hand. I can't remember everything, it was so many
4	different things. He would try and put things into my
5	hands, and sometimes I would look at them and
6	sometimes I wouldn't and I would just push his hand
7	back and say I wouldn't want it. I didn't take
8	anything from him.
9	Q When you came into the institution, were
10	you advised of the rules and regulations of the
11	institution?
. 12	A Yes.
13	Q And you were aware that it was a
14	violation of those rules for a staff member or
15	corrections officer to fraternize with inmates?
16	A There was nothing about that in the rule book.
17	I don't recall.
18	Q Did you understand that it would be
19	improper for an inmate to receive contraband from a
20	staff member?
21	A That was never discussed. That was common
22	practice, for male officers to bring things to the
23	women. I had no knowledge it was against the rules.
24	Q Did you receive an inmate handbook?
25	A Yes. A 210

1	Q Did you understand that it was your
2	responsibility as an inmate to be familiar with the
3	inmate handbook?
4	A Yes.
5	Q And did you understand it would be
6	improper conduct for an officer to engage in sexual
7	harassment of an inmate?
8	A I don't recall ever seeing that.
9	Q I understand you don't recall seeing it.
10	Did you understand that would be improper conduct?
11	Did you understand that would be conduct that you
12	would be expected to report to the administration?
13	A Not at Cambridge Springs. I saw that type of
14	thing every day, officers doing that to women.
15	Q And what type of sexual misconduct are
16	you alleging against Officer Raun?
17	A Officer Raun?
18	Q Yes.
19	A Basically, I feel that he enjoyed humiliating
20	me, he enjoyed terrorizing me. He knocked me around.
21	I don't believe at all that he even believed that I
22	was a person, that I was a human being. I believe
23	that he just enjoyed hurting me and making me afraid
24	and slapping me and pushing me and just basically
25	making me very afraid of him. A 211

1	Q So your testimony, as I gather, is that
2	he physically assaulted you, he beat you; is that
3	correct?
4	A He pulled me by my hair. He pushed me. He
5	left marks on me.
6	Q Did you understand that if a staff person
7	or corrections officer did that to you, that would be
8	something you as an inmate could and should report to
9	the administration?
10	A I thought that I could report it.
11	Q Did you report it?
12	A Yes.
13	Q When did you first report it?
14	A I went to Deputy Utz, and at that point I had
15	just told him about Raun making advances towards me,
16	because he hadn't started knocking me around yet, and
17	Deputy Utz just basically laughed it off. He said
18	Raun was a healthy young man, and he basically laughed
19	it off.
20	Q When you made that first complaint to
21	Officer Utz, Raun had not physically touched you in
22	any way?
23	A Yes. He kept putting his thumb across my mouth
24	and backed me into a corner.
25	Q Did you report that conduct specifically A 212

1	to Deputy Utz?
2	A Yes.
3	Q You said he hadn't physically abused you.
4	He hadn't hit you at that point?
5	A No.
6	Q After he struck you or pushed you around,
7	did you then make another complaint to anyone in the
8	administration?
9	A Yes. I went to Martha Miller.
10	Q Okay. And how many times did you go to
11	Martha Miller?
12	A One time.
13	Q And what did you report to her?
14	A I wrote a four-page grievance on Raun. I wrote
15	everything he had done to me that he pushed me,
16	that he sought me out while I was cleaning on my
17	isolated detail, that he repeatedly found me in places
18	where there were no staff members or inmates around,
19	that he had knocked me around, that I felt that he was
20	threatening me.
21	Q What were the locations or what was the
22	location of the areas he found you where there were no
23	other persons around?
24	A There's a building called Louter. There are
25	four floors. The only floors that were occupied were
J	

1	Floors One and Two. Floors Three and Four were very
2	damaged from the rioting at the college campus years
3	ago, and my detail was to clean the stairways on all
4	four floors and to clean Louter Three and Four. There
5	was a lot of debris and graffiti, and I was supposed
6	to try and clean it off as much as I could. I was
7	supposed to pick up pieces of wood and glass and get
8	them picked up.
9	Q Who was on that detail with you?
10	A I was by myself.
11	Q Who assigned you to that detail?
12	A Deborah Sauers.
13	Q And when did you have that
14	responsibility?
15	A From January of '93 until October of '93
16	when I'm trying to think. They put me in the
17	laundry in October and November of '93, and then I was
18	in the laundry for a while, and then they put me back
19	on the detail.
20	Q Do you recall when you went back on the
21	detail?
22	A I think April or May of '94, when I came out of
23	RHU.
24	Q And when you went back on the detail the
25	second time, was it Ms. Sauers that put you on the

1	detail the second time?
2	A I don't know. I was told by the
3	administration, by Superintendent Wolfe, that he was
4	taking my job away from me and putting me back on the
5	detail.
6	Q You mean your laundry job?
7	A No. First they had me on the detail, then I
8	was in the laundry, and then they moved me from the
9	laundry to the I was I can't remember what they
10	called it. I had a desk in the property office. I
11	processed incoming/outgoing packages, and I worked in
12	the office with Ms. Lazenby for quite a while. I used
13	to file things for her and type things, and I think I
14	worked in there for about six weeks, and then I went
15	to RHU.
16	Q And when was your last day at SCI
17	Cambridge Springs?
18	A June 27th.
19	Q Nineteen ninety
20	A '95.
21	Q So what were your assignments? You got
22	out of the RHU unit in approximately April 1994?
23	A April or May.
24	Q And your assignment when you got out
25	initially was still with Ms. Lazenby? A 215

1	A No. They told me Superintendent Wolfe I was
2	released from the RHU on a Monday. He came and told
3	me the Friday before that he would release me on
4	Monday before five o'clock, that he was taking my
5	property job away from me, and that he was putting me
6	back on cleaning detail.
7	Q And when you were back on cleaning
8	detail, what were your responsibilities?
9	A At that point it was to clean Louter Two. That
10	was where my room was. I had to clean all the
11	bathrooms, the hallways, the bathrooms. Basically, I
12	was responsible for the upkeep of the entire unit
13	where the women lived.
14	And then also when I had extra time, when I had
15	my major responsibility done, I was sent upstairs to
16	do things like wash screens on the windows, sweep, try
17	to get a lot of the debris off the floor.
18	Q And who determined when you had your
19	Louter Two responsibility completed and then sent you
20	to Louter Three?
21	A It depended on the officer. If they felt
22	that if it was a nice officer and they felt that I
23	had worked enough, they would just let me go for the
24	day, but some officers would say, well, go upstairs

A 216

and work for a couple hours.

Q What officers assigned you to go upstairs 1 and work on Louter Three? 2 Oh, my gosh. I don't remember. It was just 3 the unit -- whoever was working in the unit. It was 4 just like an offhand thing. They would just tell me 5 go up and work for a couple hours. 6 7 And did you ever go up to Louter Three without being directed to do so or without that being 8 part of your job responsibility? 9 Sometimes I would go up there to get a broom 10 and a dustpan if I couldn't find one. There were a 11 12 lot of times people would take things up there. 13 would be things that were left up there. Sometimes we 14 couldn't find the mop buckets and things, and it 15 turned out maintenance supervisors would have taken 16 them upstairs and I would have to go upstairs and get 17 them. 18 And did that happen from the first time 19 you began to work on Louter Three or did that happen 20 after you got out of the RHU and were working on 21 Louter Two? 22 That happened all the time. That was a 23 constant thing. I couldn't find the proper equipment 24 to clean the unit, and I had to go upstairs and get 25 it. A 217

1	Q Now, you make a number of allegations
2	against Officer Raun, beginning, as you indicate, in
	May of 1993, and continuing till October 1994. That
3	
4	was the last incident you're making an allegation
5	about, is October of 1994?
6	A Yes.
7	Q Could you tell me when was the first
8	incident that you recall with Officer Raun?
9	A The first time that he became angry with me was
10	right after I had gone to Deputy Utz.
11	Q I understand that's the first time he
12	became angry with you. What's the first time that you
13	and Officer Raun had sexual contact or inappropriate
14	touching contact?
15	A It was that day.
16	Q In May of 1993?
17	A Well, actually, I consider what he did, putting
18	his thumb across my lip and cornering me and hugging
19	me, I consider that inappropriate.
20	Q When did that happen?
21	A That was happening before. That's why I went
22	to Deputy Utz.
23	Q When you reported that to Deputy Utz, did
24	you report anything else to him in that period of
25	time? A 218

1	walking, but he had me by my hair, and I kept tripping
2	on the stairs. He pulled me up there and he had me by
3	my hair, and he flung me really hard into the wall,
4	and he hurt my mouth really bad. He bruised me and he
5	kept ramming himself into me and smashing me into the
6	wall.
7	Q Now, when you say "stairs," which stairs
8	are we talking about?
9	A He dragged me upstairs to Louter Four.
10	Q This is from Louter Three to Louter Four?
11	A No. I was in the stairway. I don't know what
12	landing I was on. The landings aren't marked.
13	They're just landings and stairs and stairs and
14	stairs.
15	Q And did you, when you met with Martha
16	Miller, did you report to her Raun's actions toward
17	you?
18	A I told her everything that had happened up to
19	that point.
20	Q And that included him rubbing his thumb
21	on your lips? Was he pulling your hair at that point?
22	A By the time I had gone to Martha Miller, he
23	pulled my hair. He also had been grinding himself
24	against me. He bruised my mouth really bad. I had

25

he had left marks on me that was teeth, and he had

smashed me, like rammed me into the wall. 1 So you told Ms. Miller all that? Q 2 Yes. 3 And then after he grabbed you on the Q 4 stairwell, did you then go back to any staff member? 5 No, not after what happened with Martha Miller. 6 I was petrified. I eventually went to Sandra 7 Wolfgang, but after that -- I had already gone to 8 Deputy Utz. Raun had reacted very badly to that. 9 Then I had gone to Martha Miller. He flipped out and 10 11 went into a rage over that, and I was terrified to try 12 and go to anybody else. 13 Do you understand it was a violation of 14 the rules to pass notes to officers and receive notes 15 from officers? 16 No, not at Cambridge Springs. I saw people get 17 handed notes all the time. 18 Do you recall that you were called in for Q 19 possible discipline regarding a note you attempted to 20 pass to Officer Raun? 21 Α They -- I think Captain Lazenby called me in 22 and asked me about a note, because I gave a note to a 23 girl to give to a girl that worked in dietary, and 24 somehow Raun confiscated it or got hold of it somehow, 25 and Captain Lazenby asked me who the note was for, and

1	I told him a girl in dietary, and he told me I
2	shouldn't be passing notes to other inmates, and that
3	was pretty much the end of it.
4	Q Was that the same meeting that you
5	referred to before with Captain Lazenby?
6	A No.
7	Q This is a different meeting?
8	A Yes.
9	Q And did Captain Lazenby tell you it was
10	inappropriate for you to be passing notes to other
11	inmates or staff members?
12	A He said I shouldn't pass notes to other
13	inmates. He said it wasn't specifically against the
14	rules, but he told me it wasn't a good idea, and he
15	said that he just wanted to clarify who the note was
16	to.
17	Q And was anyone else present at that
18	meeting with Captain Lazenby?
19	A No.
20	Q When were you called in by Captain
21	Lazenby regarding that note?
22	A Maybe April or May or June of '93. I don't
23	remember. It was sometime in the summer.
24	Q Okay. Was it before or after the time
25	that you allege that Raun first grabbed you by the

1	hair and dragged you upstairs to Louter Hall?
2	A I don't remember.
3	Q Now, you were in the RHU for some period
4	of time in '94?
5	A Yes. Two different times.
б	Q Okay. Do you recall the times you were
7	in the RHU?
8	A The first time was, I think, March of '94, till
9	April or May or June of '94. There was a two- or
10	three-month period the first time.
11	And then the second time, I believe, was from
12	October 10th or sometime around there until that
13	was in '94 until June 27th of '95.
14	Q Okay. Are you making any allegations
15	against Officer Raun or Officer Eicher for that period
16	of time that you were in RHU?
17	A They both at different times came back and they
18	said ignorant things to me, but nothing. They were
19	not able to physically have access to me because there
20	was a steel door there.
21	Q And do you recall whether those events
22	happened during the first time you were in the RHU or
23	the second time you were in the RHU?
24	A The first time I was in the RHU, Raun would
25	come in there and he would just look at me through the

25

door, or he would just say something to me like you'd 1. better keep your mouth shut, or just something 2 offhanded and he would keep on walking. 3 And then the second time I was in the RHU, I 4 don't remember him coming in the second time, but 5 6 Eicher came in. 7 And Eicher didn't come in the first time? Q Α He didn't work there then, Eicher didn't. 8 9 I didn't know him then. 10 Q Okay. And when you got out of the RHU 11 the first time, what allegations are you making with 12 regard to Officer Raun? That would be, I guess, in June of '94. 13 14 When I got out, he -- basically, things just 15 started up as usual. He started staring at me again. He started grabbing me by my hair. He just started 16 17 being typically nasty to me again, following me 18 around, yelling at me. 19 One time when I was in the cafeteria with a 20 table full of people, he was staring at us and then he 21 just screamed at us to get out. He just basically did 22 things that were menacing and threatening and 23 intimidating in nature. 24 Did he ever have any inappropriate sexual Q

A 225

1	'94?
2	A Yes. He periodically, repeatedly, would grab
3	me whenever he found me in deserted areas of Louter.
4	Q Let's go back. Did these incidents occur
5	anywhere other than Louter Hall?
6	A I don't remember. I believe that they all
7	pretty much happened in Louter because that's always
8	where I was.
9	Q And you made some allegations regarding
10	the stairwell at Louter Hall. Is that where most of
11	these incidents were occurring?
12	A Yes. Usually there's only one stairway. At
13	that time only part of Louter One was used, and there
14	is one stairway that inmates and staff have access to.
15	There are four other stairways. There is one stairway
16	to the left part of the building that's totally
17	deserted, and the main stairway is the second one.
18	The third and fourth stairways at the other parts of
19	the building are totally deserted and nobody uses
20	them. Inmates and officers are not supposed to have
21	access to them.
22	Q Are they kept locked?
23	A Sometimes they are; sometimes they're not.
24	Q All right. Now, you recall the first
25	event after you were released from the RHU as being a

1	time when he pulled your hair in Louter Hall. Was
2	that in the stairway?
3	A I'm not sure right when I got out of RHU. I'm
4	not it's hard to remember. It was five years ago.
5	I just know that things started right back up.
6	Q Okay. And when you got out and things
7	started back up again, did you then make a complaint
8	to anyone in the administration?
9	A I started going to Ms. Wolfgang, to Sandra
10	Wolfgang.
11	Q Do you recall the first time you went to
12	Ms. Wolfgang?
13	A I believe in July or August of '94.
14	Q And when you first went to Ms. Wolfgang,
15	did you report conduct involving Officer Raun?
16	A Yes. Officer Raun and Officer Eicher.
17	Q In the complaint you indicate, I believe,
18	that the time period before the events with Officer
19	Eicher were between August of '94 and October of '94.
20	Does that mean when you first went to Ms. Wolfgang it
21	was after you were having trouble with Officer Eicher
22	also?
23	A Yes. I began having trouble with him
24	because well, actually, October of '93 things
25	really started to get bad. Christmas Eve, that was

1	the first time he told me he said I haven't hurt
2	you yet, but I could, and that was when things started
3	to get out of line with him.
4	Q That was before you were put in the RHU?
5	A Yes.
6	Q All right. At some point after you got
7	out of the RHU, you went to Ms. Wolfgang and you
8	reported an incident involving Officer Raun and
9	Officer Eicher; is that correct?
10	A Yes.
11	Q And you don't recall exactly when that
12	was, but it was sometime after you got out of the RHU?
13	A Right.
14	Q And then you were telling me that you
15	were placed in the RHU a second time?
16	A Yes.
17	Q And that was approximately when?
18	A October of '94.
19	Q Okay. And that from October of '94 you
20	didn't have any problems with either well, you had
21	no problems at all with Officer Raun, and the only
22	problem you had with Officer Eicher, he would
23	occasionally walk by in the RHU?
24	A Yes. And he would come outside my window on
25	third shift, I guess to do building checks, and he

grab me, I think just to let me know that he could do 1 it. 2 But the next time that was really bad was in 3 October when he rammed his knee into me in the 4 stairway. That was the time that he really, really 5 hurt me. I had big marks on me and my leg hurt really 6 7 bad. That was one time in October of 1994? 8 Q 9 Α Yes. And were there any times prior to that 10 0 where he beat you to the point where you felt the same 11 kind of pain you say you did in October of '94? 12 Yes. When he would ram me into the wall and he 13 would grind himself into me, he would leave bruises on 14 me, on my legs and down across my pubic bone and on my 15 lower stomach, and he would like squeeze me really 16 17 hard here and pull my hair, and like I had bruises on my mouth from his teeth. 18 19 How many times did that conduct occur between June of '94 and October of '94? 20 21 I don't know. Every chance he got, every Α chance where he found me alone or where he ran into me 22 23 at work. Was it once a month? 24 25 It was far more than that. It was several Α No.

times a week. 1 Now, you're saying on many of those 2 occasions he grabbed your arms? 3 That's how he would hold me. Sometimes he 4 would grab me here. When he had me against the wall, 5 he would put his hands and push my shoulder back. 6 And did that conduct cause bruising on 7 your body? 8 Yes. 9 And that happened, would you say, at 1.0 least once a week? 11 More than once a week. 12 More than once a week? 13 It was bad enough to the point that I 14 Α basically had to schedule my visits around when I 15 didn't have marks on me. I would call my parents and 16 17 say you can come tomorrow, because I knew if the 18 officer saw it, that they would call the administration, and Raun would get in trouble and it 19 20 would be a lot worse. How many times, from June through October 21 1994, did you seek medical attention for those 22 23 bruises? None. The doctor saw me one time, and that was 24 in October when Ms. Wolfgang saw the bruises and she 25

went and told Deputy Utz and Superintendent Wolfe.
Q Did you ever receive any notes from
Officer Raun?
A Yes.
Q Did you keep those notes?
A No. I tore them up and flushed them down the
toilet.
Q And did you ever send any notes to
Officer Raun?
A No.
Q The times that you indicated that Officer
Raun assaulted you in the stairwell or in areas in
Louter Hall, did you ever obtain any articles of his
clothing or parts of his uniform?
A Did I ever what?
Q Did you ever get possession of any
articles of his clothing or his uniform?
A No.
Q Did you ever have in your possession his
name tag or any parts of his name tag?
A Did he ever give me his name tag?
Q Did he ever give it to you or did you
ever take it or did you ever have it in your
possession, his name tag, or any parts of his name
tag? A 231

1	A Absolutely not.
2	Q Did you ever have sexual intercourse with
3	Officer Raun?
4	I'm sorry. I didn't hear you. You have to
5	give a verbal response.
6	A No.
7	Q Did you ever report that you had sexual
8	intercourse with Officer Raun to anyone?
9	A I said that I think I said "sexual contact."
10	That's I'm pretty sure that's the wording I used.
11	I consider that sexual conduct I don't know if
12	other people do, but I consider a man rubbing himself,
13	even with clothes on, I consider that sexual contact.
14	Q And did you ever have any type of oral
15	sexual relationship with Officer Raun?
16	A Absolutely not.
17	Q All right. You indicated that, with
18	regard to Officer Eicher, that in December of '93, I
19	believe, he was bringing you gifts or offering you
20	gifts, and then you were in the RHU for a period of
21	time?
22	A Yes.
23	Q And after you came out of the RHU, when
24	was the first incident you recall with Officer Eicher?
25	A He started pretty much when I got right out. I

remember he grabbed me and kissed me in front of my 1 friend Leanne. 2 3 0 What was Leanne's last name? Α Giaffco. He basically just started fondling 4 5 me, grabbing me, kissing me. 6 Was that in front of Leanne Giaffco, what 7 you just described, or just a kiss? 8 He grabbed me, he grabbed me, like he put his Α 9 hand, he grabbed me by the butt and like pulled me 10 against him and kicked me in front of Leanne, and I think that happened two or three times. 11 12 It was when we would go to "creams and things," 13 because I had an operation on my feet because I ran a 14 26-mile marathon at the prison, and when I was done 15 running the marathon, my toenails had turned black and 16 blue because the nurses sprayed us with water, and the water was in my shoes, and my toenails peeled back 17 18 when I was running. 19 And when my toenails came in, they came in 20 under my skin, and I had to go to the doctor. And he 21 had to go -- he had to cut into my toes, and he had to 22 burn the roots with acid to make the toenails come 23 back in properly. And my feet were bandaged, and I think they 24 were stitched too, and we had to go to "creams and 25

1	things" every night because I had to get Epsom salts
2	to clean my feet and ointment and all kinds of things,
3	and this would happen when we went to "creams and
4	things."
5	Q And Leanne Giaffco would go with you?
6	A Yes.
7	Q Was anyone else present?
8	A There might have been, but nobody I
9	specifically recall. That's a big hall. It has
10	basically I guess what you would consider cathedral
11	ceilings, and it's very huge and open. It's just very
12	big. There's a lot of space in there.
13	Q Okay. You allege in your complaint you
14	had sexual intercourse with Officer Eicher on three
15	occasions?
16	A No. That he made me have sexual intercourse.
17	Q What you allege in your complaint
18	A Excuse me?
19	Q Never mind.
20	Is that accurate, that there were three
21	occasions you had sexual intercourse with Officer
22	Eicher?
23	A Far more than three occasions.
24	Q Far more than three occasions?
25	A Yes. A 234

1	Q What was the first occasion?
2	A It was March 19th of 1994.
3	Q Didn't you indicate that you were in the
4	RHU in March of '94?
5	A It must have been later than that. It must
6	have been later than March.
7	Q And the first time this happened, where
8	was it?
9	A It was in the music room.
10	Q And was anyone else involved other than
11	Officer Eicher?
12	A Yes. Sergeant Merry, Jim Merry.
13	Q Anyone besides the two of them?
14	A No.
15	Q And after this happened, you're alleging,
16	I assume, that Officer Eicher forcibly raped you on
17	March 19, 1994?
18	A Yes.
19	Q And that he
20	MR. LOVE: Excuse me. I think she
21	said it might have been later. You said
22	March, and you said she was in RHU, and
23	she said it might have been later.
24	THE WITNESS: No. The RHU.
	MR. HALLORAN: The RHU might have

1	been later.
2	THE WITNESS: I think I went to
3	the RHU in April. I know it was warm
4	out, and I get confused about the months
5	when it's warm out.
6	·
7	BY MR. HALLORAN:
8	·
9	Q Okay. Did you report that particular
10	event to anyone at SCI Cambridge Springs?
11	A No.
12	Q And sexual intercourse occurred on some
13	other times also?
14	A Yes.
15	Q When was the first time that you reported
16	those events?
17	A I believe to Ms. Wolfgang.
18	Q Did you report to her that Officer Eicher
19	was raping you in these events?
20	A I told her that he was making me do things, and
21	then I told her what the things were.
22	Q What did you tell her he was making you
23	do?
24	A I told her that he was making me have sex with
25	him, that he was taking my clothes off. And she said

wait a minute, how can he make you do something. And I said you don't understand, Sergeant Merry was in on it, Sergeant Merry made me go in there, there's nothing I can do about it.

And she was really shocked. She didn't understand how he could find the time, I guess, when she was in there. She didn't understand how something like that could happen.

And then I told her that Sergeant Merry had taken me in there and put me in there and locked the door, and then he made me go in there.

Q Was Sergeant Merry involved in any of these events other than the first one?

A I think that he stood watch. That's what Eicher told me. He would say that Merry was outside the door. But I don't know if that was true or not. I remember sometimes I would see him like in the vicinity of the area before or after something happened, but I never knew. That was the only time that he physically grabbed me, took me down the hallway, shoved me in a room and locked the door.

That was the only time he was there when I came out.

Q That was the first time?

A Yes.

O And how long after the first event was it

before you told Ms. Wolfgang?

A That happened in March. I'm sure that's when it happened, because it was my daughter's birthday. I had a visit that day, and I remember that very clearly.

I believe I went to RHU April 7th, now that I think about it. I reported it to her in July or August.

- Q And were you eventually interviewed by a representative of the Department of Corrections

 Internal Affairs Section, Michael Wolanin?
- A Michael Wolanin, yes.
- Q And following those interviews, were criminal charges filed against Officer Eicher?
- A I saw Michael Wolanin several times. We did not have a good rapport at first at all. It took him several times of coming to see me and then my taking or passing a polygraph test for him to actually begin to lend credibility to what I was telling him.

And then after I gave him the letters that

Officer Eicher had written to me and he had a

handwriting analysis done and it proved to be Officer

Eicher's handwriting, that's when he believed me, and
that's when he started doing things to get me

transferred, and that's when he had Officer Eicher

1	meeting lasted four hours?
2	A Yes.
3	Q And that you indicated to Ms. Miller that
4	you felt that Officer Raun was going to rape you?
5	A Yes.
6	Q And in the course of that meeting, did
7	any discussion occur about the note that you had been
8	accused of sending to Officer Raun?
9	A I don't remember. She might have asked me
10	something. I don't remember. It was a long time ago.
11	Q And Paragraph 13, you refer to written
12	request to Debbie Sauers?
13	A Yes.
14	Q And you indicated that she said to you
15	that "none of the supervisors or the girls wanted to
16	work with a killer"?
17	A Yes.
18	Q That's what she said to you?
19	A Yes.
20	Q When was the meeting with Debbie Sauers?
21	A I don't remember exactly when it was. I just
22	know that as soon as I thought of it, I started
23	thinking of
24	MR. LOVE: Can we wait until they
25	go through? I can't hear. A 240

1	Paragraph 13 where you say she made the comment about
2	working with a killer, and there's another meeting,
3	apparently in October, where you indicate that you
4	were very upset and you wanted to go to her office,
5	and that's when she told you she was going to put you
6	in the laundry?
7	A That was one of the officers called her
8	because I basically was flipping out, and they had
9	never seen me act like that, and I was very
10	hysterical. And Debbie Sauers was marked down as my
11	counselor at that time, and when an inmate has a
12	hysterical problem, the officers are supposed to call
13	a counselor, so that's who they called.
1 4	Q And in Paragraph 20 you were talking
15	again about when Officer Eicher first approached you,
l 6	and I just want to be sure I touched this base. When
17	was the first time that you complained about Officer
18	Eicher?
L 9	A To Ms. Wolfgang.
20	Q And I gather that would have been August
21	of 1994?
22	A Yes.
23	Q And when you complained to Ms. Wolfgang,
24	as it relates to at least Eicher and Raun, you had
25	complained in the same manner that you set forth in

this affidavit; were these basically the complaints 1 you were making about Eicher and Raun? 2 Yes. I would tell her. It was in a 3 conversation. I didn't write anything down. 4 I think I should also clarify that I didn't 5 give her this much detail. I didn't go into -- I just 6 would tell her what was happening. I didn't give her 7 all the details. 8 You mean about the locations and things 9 like that? 10 No. I would tell her where something happened, 11 and I would say that he pulled my clothes off and he 12 made me do this and things like that, but I didn't go 13 into all the detail about how I felt and exactly what, 14 all of that. 15 Was Ms. Wolfgang upset when you told her 16 17 your story? Yes. 18 Α 19 Was she crying, too? She was -- she started -- she was very upset, 20 but she got really upset and her eyes got really wet 21 when I pulled my clothes down and showed her the 22 bruises. 23 So that was in October of 1994? 24 25 Yes. A A 242

1	Q Ms. Lambert, you were in the RHU in April
2	of '94. Regarding your being found in an unauthorized
3	area, the fourth floor of Louter Hall, do you recall
4	that?
5	A Yes.
6	Q And at that time do you recall what you
7	told the staff people about why you were there or how
8	you were there?
9	A Yes.
10	Q What did you tell them?
11	A I told them that I was dizzy and that I got
12	confused and went up there.
13	Q Did you indicate you blacked out?
14	A Yes.
15	Q And around that time do you recall being
16	interviewed by Captain Bartlett regarding your
17	presence in that area?
18	A Yes.
19	Q And did he ask you questions about
20	whether or not your presence there had to do with some
21	meeting with Officer Eicher?
22	A He didn't ask me. He screamed at me and
23	slammed his fist down on the table. I was scared to
24	death of him he was five times the size of me
25	and I wouldn't tell him anything. A 243

1	Q He was asking you whether or not you were
2	there to have
3	A He was screaming at me.
4	Q And what he screamed was were you there
5	to have a liaison with Corrections Officer Eicher?
6	A He said are you F'ing Officer Eicher. He said
7	I know you are, I know how you girls are, I know
8	you're F'ing Officer Eicher.
9	Q What was your response?
10	A I told him that I don't know what he was
11	talking about, I told him I had nothing to say to him,
12	and I told him I didn't want to talk to him.
13	Q Now, the truth was that at that time you
14	and Officer Eicher were having sexual intercourse?
15	A I didn't hear you.
16	Q At or around that time you and Officer
17	Eicher were having sexual intercourse?
18	A We were not having sexual intercourse. He was
19	forcing me to do things.
20	Q And among the things he was forcing you
21	to do was sexual intercourse?
22	A Yes.
23	Q And when Officer Eicher was asking you
24	about that, you denied
25	A I can't hear you. A 244

1	Q When Officer Eicher asked you about your
2	relationship I'm sorry. Strike that.
3	When Captain Bartlett asked you about what was
4	going on between you and Officer Eicher, you denied
5	any such conduct?
6	A I told him that I didn't want to talk to him,
7	number one, because I was afraid of him, and, number
8	two, when Officer Eicher pulled me down the back
9	stairway and put me into my room that night, he told
10	me I'd better keep my mouth shut or he was going to
11	get me.
12	Q And, therefore, you denied
13	A Right.
14	Q that anything happened?
15	A Right.
16	Q When you went to Ms. Wolfgang in August
17	of 1994, did you disclose to her the identities of any
18	of the officers that you were complaining about?
19	A I can't hear you.
20	Q When you went to Ms. Wolfgang in August
21	of '94, did you disclose the identities of any
22	officers that you were complaining about?
23	A The first two weeks I talked to her, she had me
24	call them Officer One, Officer Two, Officer Three, in
25	regards to Sergeant Merry, Eicher or Raun. She